



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

July 18, 2008

Mr. Steve McCracken
Assistant Manager for Environmental Management
DOE-Oak Ridge Office
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. McCracken:

Recommendation 172: Recommendation to the Department of Energy-Oak Ridge Office of Environmental Management on Lessons Learned from Effort to Preserve the North Tower of the K-25 Building for Historic Purposes

At our July 9, 2008, meeting, the Oak Ridge Site Specific Advisory Board approved the enclosed recommendation.

We appreciate your consideration of this recommendation and look forward to receiving your response by October 9, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance J. Mezga".

Lance J. Mezga, Chair

Enclosure

cc/enc: Dave Adler, DOE-ORO
Mike Farmer, Roane County Mayor
Doug Frost, DOE-HQ
Pat Halsey, DOE-ORO
Connie Jones, EPA Region 4
Rex Lynch, Anderson County Mayor
James O'Connor, Oak Ridge City Manager
Melissa Nielson, DOE-HQ
John Owsley, TDEC



Oak Ridge Site Specific Advisory Board Recommendation 172: Recommendation to the Department of Energy-Oak Ridge Office of Environmental Management on Lessons Learned from Efforts to Preserve the North Tower of the K-25 Building for Historic Purposes

Background

The K-25 Building located at East Tennessee Technology Park (ETTP) on the southwestern end of the Oak Ridge Reservation (ORR), was built between June 1943 and early 1945 for the purpose of using the gaseous diffusion process to separate uranium-235 from uranium-238. Operations continued in the building until 1964.

In 1989, the ORR (including ETTP) was placed on the Comprehensive Environmental Restoration, Compensation, and Liability Act National Priorities List to undergo environmental cleanup. In February 2002, the Department of Energy-Oak Ridge Office (DOE-ORO) Manager approved an Action Memorandum that selected demolition of K-25 as a cleanup alternative. Because the community expressed concern for the preservation of historical property, DOE teamed with preservation experts and public participants to evaluate preservation priorities. Final preservation plans were to be documented in a Memorandum of Agreement (MOA) with the consulting parties.

On March 28, 2005, DOE-ORO ratified an MOA with the consulting parties that calls on DOE to retain the north tower of K-25 that connects the two-long 'legs' of the building, mark the footprint of the building, and the retain the upper 10 feet of the inner basement area walls between the legs. The resulting walls could be used for murals and other visual displays to explain the historical significance of K-25. Markers along the former foot-print of the building would help visitors comprehend the size of the structure.

Since the MOA was signed the building has deteriorated rapidly, and DOE began to reevaluate how best to preserve the historical significance of K-25. DOE requested input from interested organizations, including the Oak Ridge Site Specific Advisory Board (ORSSAB), and individuals concerning the north tower and if it should be retained for historical purposes.

The ORSSAB Stewardship Committee heard presentations on the topic at its December 2007 meeting from the Partnership for K-25 Preservation (PKP) and the American Museum of Science and Energy on alternatives to preserve the history of K-25. After those presentations the Stewardship Committee formed a subcommittee to study the issue and develop a recommendation for the full board to consider.

On February 19, 2008 ORSSAB and the Local Oversight Committee sponsored a public meeting to receive community input on the decision making process of historic preservation of the K-25 Building North Tower. Historic preservation options were presented by DOE-ORO and PKP, as well as members of the community. In addition to receiving live public comment, questionnaires were made available to gather input. The subcommittee used the public meeting, the results of the questionnaire, and input from ORSSAB members to formulate a recommendation.

Discussion

In April 2008 ORSSAB passed a recommendation encouraging DOE to preserve the north tower of K-25 using proposals put forth by PKP. However, passage of the recommendation was not unanimous, and

several members of ORSSAB submitted a minority opinion saying the north tower was not worth saving and other methods should be used to commemorate the historical significance of K-25.

Much of the discussion surrounding the preservation of K-25 centered on the condition of the building. It had sat idle for almost 40 years with little maintenance to preserve its structural integrity. In accordance with Section 110 of the Historic Preservation Act, properties that are listed are may be eligible for the National Register of Historic Places must be managed and maintained in a way that considers the preservation of their historic, archaeological, architectural, and cultural values. The K-25 building has been subject to natural degradation accelerated by the intrusion of rainwater.

When efforts began to dismantle the portions of the building not targeted for historical preservation it became obvious that the building was in extremely poor condition and was even dangerous, a point tragically brought to the forefront in January 2006 when a worker fell through the operating floor and was seriously injured. The method of demolition was changed to better protect workers, which even entailed the paradoxical undertaking of shoring up parts of the building to make it safe for demolition.

The rapidly deteriorating facility conditions, revised historic preservation estimates, and requirements of the International Building Code raised questions about the justification for saving the K-25 North Tower: could it made safe for public use; would it cost more to save it that it would be to demolish it and commemorate differently?

To date DOE-ORO still has not decided whether to implement the proposals put forth by PKP or recommend demolishing the north tower.

But because K-25 was allowed to deteriorate so much, interested parties wondered what could be done to prevent other buildings on the ORR with historic value from deteriorating as K-25 had.

In an attempt to prevent the loss of other buildings within the Environmental Management scope on the ORR with historical significance because of neglect, the following recommendations have been developed.

Recommendations

1. Facilities identified for historic preservation must be maintained to ensure historic preservation is an option.
2. DOE should conduct a comprehensive facility assessment prior to entering into an MOA for historic preservation of a facility.
3. DOE Headquarters should identify a liaison for implementation of the Historic Preservation Act for DOE Environmental Management activities.
4. DOE should develop a comprehensive and detailed Historic Interpretation Plan vetted by the local community prior to entering into an MOA of historic interpretation.
5. DOE should seek feasible exemptions for historic structures from the current International Building Code at the appropriate time.
6. DOE Headquarters should establish clear and assured funding baselines for historic preservation.
7. DOE should require that funding estimates for historic preservation efforts are consistent with revisions to funding baselines for cleanup actions.